

ECOGLOBE LLC	Information of Certification	Code GC/DM/IC-10.8
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**General Client Information about
 organic certification services
 based on
 EU Regulation 2018/848 and ISO 17065**

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Certification body ECOGLOBE LLC

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Operational Address: 80 Aram Street, 4th Floor, 0002 Yerevan, Armenia

Phone number: +37499221295 whatsapp/mob.

Certification areas:

A – Plant products, including collection of wild plants, seed and propagation material;

B – Live or unprocessed livestock products, including beekeeping;

D – Processed agricultural products for the use as food

F - Wine

G.

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ECOGLOBE LLC is organic certification (control) body recognized by European Commission and Switzerland as compliant according to EU Reg. 2018/848, Article 46.

ECOGLOBE LLC is certification body accredited by DAkkS, Germany, for compliance with ISO 17065. The valid latest accreditation certificate is published on web site of certification body www.ecoglobe.com and on the web site of accreditation body DAkkS, www.dakks.de.

Term “Standard” is further used in this document and means organic standards established by the EU Commission Regulation 2018/848 and regulations/acts accompanying this main organic regulation

The information provided further is aimed to show the implementation of certification process, including inspection/assessment of production process and the certification.

This document provides also general description of New EU Regulation 2018/848, which entered into force from 01 January 2022.

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Inspections

The objective of inspection is conducting systematic, independent, impartial assessment of organic management systems aimed at identification of its compliance with requirements. In the process of control/inspection the whole organic production process is being assessed.

Initial Inspection

- As a rule the first inspection is scheduled during the first month after getting an application and documentation package.
- During the first inspection the description of production (Organic System Plan) and compliance with standard is being assessed.
- Assessment of all parts of production, storing, transportation, the staff knowledge of organic production rules, documentation and registration systems to guarantee the traceability of the production tracing is conducted during the initial inspection. The non-compliances which require further improvement are identified.

Further annual inspections

- All changes in system of certification should be provided to certification body well in advance, normally not later than March 15th of each year.
- Organic production should be assessed at least once a year, to make sure the successive and uninterrupted compliance with the standard.
- If there are any changes in organic production unit, it is required to provide the updated form of Organic System Plan for preparation of next annual inspection.
- Additional to the annual scheduled inspections, there can be also unannounced inspection visits without preliminary notification. Results of inspections are later being provided as a report to the certifying body. In the report are indicated non-compliances with the standard and corrective actions.
- Inspector, as an evidence of conducted inspection and agreement of operator with its results is leaving at the place of inspection a form of Exit Interview, signed by inspector and operator, or his authorized representative.

Inspection visits include the following types of mandatory and called upon specific production circumstances of operator's activities.

- **Initial Assessment** is being processed after submission of application for certification, signing organic certification agreement and submission of Organic System Plans. During the initial assessment the compliance with Standard and organic system plan of the applicant is going to be assessed.
- **The in conversion period**

For operators, having organic plant, livestock and beekeeping production have to undergo the conversion period. The duration of conversion / transition period is different, depending on the

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type of operation, and stipulated by Standard. For more details please refer EU Reg. 2018/848.

In general, the conversion period is following

24 months before sowing- for annual and bi-annual crops;

36 month- for perennial crops before harvesting;

For livestock in conversion period is relevant to the period of conversion of grazing areas.

For beekeeping duration is determined with the duration of replacement of beewax with the organic beewax.

More details and derogation opportunities can be found in the Standard.

- The beginning of the conversion period is, normally, considered the date of the first inspection or application (to be determined by certification body), which needs to be conducted based on the dates established by the procedure. In cases when the date of first inspection is not suitable for any reasons, including climate, weather, season, etc, the assessment of the operator's organic activities, the appropriate conditions and dates are developed and agreed with operator. Based on the individual situations the beginning of the conversion period can be considered also date of the contract or application. The list of evidences and the conditions for retroactive recognition of conversion period are set up by the Standard, so it is transparent and provided to the operator. It is expected that the operator prepares and provides all necessary evidences throughout inspection and certification process.
- **Annual inspections** are being processed every year during conversion period and after issuing full organic certificate to Operator. According to standard the first organic certificate for annual or bi-annual crops has to be issued for the first crop sowed after two years, and for perennial first harvest after 36 months of successful application of the Standard requirements. For beekeeping organic certificate can be issued after full replacement of beewax as it is required according to the Standard.
- **Surveillances and additional, including unannounced/non-planned** inspections are risk based or conducted as a result of non-compliances and corrective actions. The unannounced audits (surveillances) are being processed during the ongoing year to check the Operator's organic production or to highlight specific matters. The types of inspections and surveillances are indicated in the certification agreement between the operator and the certification body

Information about operator's duties in extraordinary cases.

- **Postponing or cancellation of the audit**

The inspections schedule has to be figured out and discussed between Operator and certification body.

In case if Operator is requesting the cancellation, postponing or change the inspection schedule, it has to provide the motivation but not later than 30 days before proposed date of inspection.

Otherwise the certification body is allowed to charge a fee equal to price of one inspection to cover the administrative costs.

- **Premature cancellation of the inspection**

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In case if an ongoing inspection is prematurely cancelled at Operator’s insistence, it has to be covered with the cost of that audit, by Operator.

Operator duties and checks during inspection

Traceability: documentation and registrations

All data, which needs to be taken into account, should be documented and registered by organic operation.

This issue can be explained to applicant and operator additionally, if needed.

Following information about production system under certification needs to be documented:

- For land applying for conversion, details of previous treatments over the last, preceding application, at least three years with agrochemicals, artificial fertilizers and materials not permitted by Standards, by field or crop;
- What crops or Livestock were produced and from what land areas or paddocks each and every season, and what yields were produced;
- The source, type, composting treatments and rate of usage of organic materials and mineral products used for fertilization , by field or area’
- The source, type and usage of products used for pest and disease control;
- The origin, nature and quantities of all materials that have been brought into the unit (whether Organic or Non-Organic), including seeds, records of receiving inspection to verify the integrity of containers and packaging (CERTIFICATION BODY may require Units to retain signed statements that products contained no Genetically Modified Organisms or derivatives thereof);
- Details of products and quantities processed, including batch or lot numbers, sufficient to permit the ingredients of a product to be traced back through the processing system from the goods dispatched to the goods received;
- Where all certified Organic product was sold , including dates of delivery and volumes of what type of output was sold and the name of the purchaser or consignee;
- Records showing a periodic reconciliation of all purchased materials, own grown materials, materials sold and still in stock.
- For livestock farmers (and apiaries where applicable), a full stock reconciliation kept in the form of a register. This will provide details of all animals arriving at the Unit, their species, origin and date of arrival, Organic status, conversion period if any, identification mark and details of any past veterinary treatments. It will also provide details of all livestock leaving the Unit, their age, weight in case of slaughter, identification marks and destinations. All animals lost (for whatever reasons) shall also be recorded;
- For Livestock farmers records of the use of any veterinary medicinal product, including the:
 1. date of purchase;
 2. name and active ingredient of the product and the quantity purchased;
 3. supplier of the product;
 4. identity of the animals treated;
 5. number treated;

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6. the diagnosis;
 7. the dose rate;
 8. dates of treatment start and completion, and method of administration;
 9. total quantity of product used;
 10. length of the label or legal withdrawal period;
 11. earliest date of sale of the animal or it's product
 12. name of the person who administered the product.
- For livestock farmers details of all feed, including the type, (including all purchased feedstuff and the constituent ingredients of that feed), periods of access to free range areas, the proportion of the constituents to the total feed on a dry matter basis and the source of the constituent parts;
 - Financial records showing revenue derived from the sale of Organic produce, and all purchase invoices, which shall be reconciled against full trading and/or tax accounts;
 - A record of all complaints received from customers or the public about the product or production system.

Records shall be comprehensive enough to demonstrate that the requirements of this Standard have been met, and shall be retained for a period of not less than five years. A short description (e.g. location of files, frequency of update) of the record keeping system is required.

Labeling, trade mark

- Certification body controls the use of EU organic and private logo, trade marks, references on organic certification and organic labeling.
- When organic certificate is issued the operator gets right to use the name of certification body, trade mark certification body, as well as references saying that product was produced in organic production unit, labeling words as “organic”, ”ecological”, ”biological”. Labeling of multi ingredient products is regulated by rules set by EU regulation Standards and requires authorization of certification body.
- Certification body controls use of references on organic production, trade marks and names of certification body, corresponding labels, advertisements, printed and electronic publications, related to scope of certification and certified production.
- Before producing/publishing labels, printing publications etc., operator shall officially in written agree with certification body their use. For official authorization please apply to the certification body. Every label and advertisement shall be authorized by certification body before printing and use.
- The EU organic logo (so called “green leaf”) shall be also used on labels of products certified by ECOGLOBE LLC with consideration of requirements of EC Regulations 2018/848. For official instructions please apply to your certification body to get the manual on how to use EU organic logo. It is strictly prohibited to use EU organic logo based on operator’s or any other party’s free interpretation. Such unauthorized use may

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be the basis for sanctions issued by the certification body or market authorities (Member state, EU Commission).

Certification: issuing, maintenance, prolongation, suspension, termination and withdrawal.

Based on positive results of inspection visits certifying body is deciding to issue an organic certificate to the Operation as determined in the application for certification, contract, as well as in organic system plan.

The certificate is updated every year or can be prolonged based on annual inspections.

If non-compliances or violations of the Standard are found the certification body can decide to deny (for first time applicants), suspend, terminate the Operator's certificate. Operator has right to announce withdrawal of certification at any time. The financial issues and provided actual services will be determined according to agreement between certification body and the operator.

- The results of inspection are provided in form of the report. The copy of report is provided to operator/customer by certification body.
- Based on inspection report staff authorized for review and certification reviews and takes decision on certification.
- A certificate is issued for products and type of operation, proving the fact that it was produced in line with organic agricultural production Standard.
- Organic certificate shows volume of production, the list of certified products and their quantity. Certificate is usually valid for 1 year.
- Certificate is issued in electronic and/or hard copies (hard copy can be requested by operator).
- If the result of assessment is negative the certificate can be terminated or suspended.
- Certification body is using sanctions system (Catalog of sanctions is public and can be provided upon request to operators).

Tariffs and fees

Service fees provided by certification body can be revised as a result of internal audits of the organization and economic situation, in general.

Information about tariffs and fees is published and accessible for all interested parties.

All applicants can get familiar with the fees and tariffs via web site of certification body www.ecoglobe.com.

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Operator's duties

Operator is responsible as a minimum for the following:

- Compliance with the Standard rules and requirements.
- Providing free access for certification body and its responsible personnel, accreditation body and European Commission representatives to their personnel, all documentation (including financial documentation), facilities, infrastructure, and production sites, which are directly or indirectly related to the organic production of Operator. Access to non - organic parts of operation in case of parallel production in the operation.
- Notifying certification body about all changes in organic production system or any other activities, which can affect the certification process, including changes in the organic production management, ownership, type of production, etc.
- In case of violation of the Standard operator is obliged to undertake the following actions:
 - immediate withdrawal of all references on organic certification
 - cancellation of use and withdrawal of all labels, logos, certificates etc. connected with organic status of production of Operator and its products.
- Providing certification body with any information, which is related with certification and control systems, and can have significant impact on contract of certification between operator and certification body, including announcement to certification body of violations and undertaken actions, as well as any complaints to organic products from consumers and market.

This information is offered to your attention and certification body is ready to discuss it with you. In case of your agreement with the service conditions you can fill in the application form and apply to the certification body (see more in attachment).

Confidentiality of all information about Operator obtained during the process of certification is provided and is regulated by the contract.

Information about standards and certified/suspended/terminate/denied/withdrawn organizations, producers and certified categories is published on web site www.ecoglobe.com and is provided at the request.

You can ask your certification body to provide with information or find it on company web site.

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General information regarding EU Regulation 2018/848

The new organic regulation (EU) 2018/848 will apply from 1 January 2022 .

The text that has been adopted represents the “Basic Act”. This means that many details of the text were further developed and still will be developed. This will happen through other legal acts called “delegated acts” and “implementing acts”.

Main changes compared to the previous legislation EU Reg 834/2007, 889/2008, 1235/2008.

For the new regulation, the categories of products that can be organic certified are:

1. Live and unprocessed agricultural products - animals, plants and seed, mushrooms;
2. Processed food;
3. Feed.

The novelty is represented by Annex I of the new regulation, which provides a list of products that are not clearly covered by the three categories but that can still be certified. This list includes:

- specific yeasts,
- maté,
- vine leaves,
- palm hearts,
- hop shoots,
- silkworm cocoon,
- natural gums and resins,
- essential oils,
- cork stoppers,
- raw cotton,
- raw wool,
- raw hides,
- plant-based traditional herbal preparations.
- sea salt and other salts for food and feed, even if those are not living organisms
- production of chicory heads or sprouts.

Mass catering operations, i.e., restaurants and canteens, are outside of the scope of the regulation.

However, national or private standards can be applied.

[ECOGLOBE LLC] [Caucascert LLC] can guide you in case you wish to get certified for this category.

New Objective and principles

Among the objectives, the encouragement of short distribution channels and local production is new.

Among the principles, the concept of production connected to the soil is reinforced and references to ‘contribution to a non-toxic environment’, ‘long term fertility’ and ‘biodiversity’ are new and positive.

Another new principle is to incentivise the use of organic plant reproductive material and animal breeds with a high degree of genetic variety, resistance against diseases and longevity.

For food, the exclusion of food containing or consisting of engineered nanomaterials is new.

Production rules for farmers

Equivalence mechanism in countries outside EU is no more valid.

New regulation is allowed everywhere in the world, including the EU.

Group certification

Group certification means that a certain number of small farmers can get organised and be certified as a single entity. One certificate will cover all the farmers, who cannot sell their certified products other than through the group itself. Specific criteria are established to define what categories of farmers can join the group.

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With the new regulation it will be possible for organic farmers to access heterogeneous material i.e., mostly seed for arable crops. With preceding regulation seed is not 'legally' available to farmers because it is characterised by a high level of genetic and phenotypic diversity. This diversity is very good for organic farming - as opposed to the general seed law that requires high level of homogeneity of seed.

The concept of cultivating in close connection with the soil is reinforced in the new regulation. Very few exceptions to this rule are allowed, for instance the production of chicory heads or sprouts.

A ten-year derogation is also given to “demarcated beds”, which are traditionally used in some Nordic countries. This derogation will apply to the existing and certified operations in only three countries: Finland, Sweden and Denmark.

For livestock farmers, higher percentages of feed should come from the farm itself or from the same region. 60% (70% from 2023 on) of feed for cows, sheep, goats, horses, deer and rabbit and 30% for pigs and poultry should be of regional origin.

For comparison in previous regulation the percentages are 60% and 20% respectively.

Derogations that were permanent will be transitional in the new regulation. Therefore, farmers have continued access to non-organic seed or young animals when those are not available as organic – but for a certain period only.

The transition of derogations will be supported by national databases that will make the quantity of organic seed and young animals publicly available. It is stated clearly that these derogations can only be used when organic seed and organic young animals are not available on the market.

Production rules for food processors

In the new regulation, the **use of natural flavours is strongly restricted.**

All natural flavours are allowed, while from 2022 on only natural flavours originating from the mentioned ingredients can be used in organic processing. For example, only “natural lemon flavouring” will be allowed, which means that the flavouring is at least 95% obtained from lemon.

Rules for obtaining **organic flavours will also be detailed.**

A restricted list for cleaning and disinfection products for use in processing will be established.

Until now such restricted list does not exist.

The flexibility to indicate the origin of ingredients is slightly increased.

In old regulation to identify a product as from "EU agriculture" or "Bulgarian agriculture", at least 98% of the ingredients should be farmed in the EU (or in Bulgaria).

With the new regulation the minimum percentage will be 95% and even a region can be mentioned, e.g., if 95% of the ingredients are farmed in Tuscany, the reference "Tuscany agriculture" can be used.

Control and certification

The organic control system will be closely linked to the **new general legislation (² Regulation (EU) 2017/625)** on official controls for food and feed that was published in 2017.

Additionally, **specific control requirements for organic are detailed in the new organic regulation.**

Besides the aforementioned **group certification,**

The other novelty is that the annual physical inspection will not be mandatory for everyone.

Until new regulation it applied to 100% of certified farms / facilities. A derogation for low-risk farms/facilities implies that those farms / facilities are inspected every **24 months rather than every year.** However, in third countries this rule will be less applicable.

Controls will have a **strong risk-based focus.**

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Retailers that only sell pre-packaged organic products will not need certification but will be subjected to the checks of the general official controls legislation. However, retailers that wish to use own trade mark on labels of pre-packaged products shall be certified.

Additionally, Member States can decide to exempt farmers who sell small quantities of organic products directly to the final consumer from certification.

The topic related to the actions to be taken when residues of non-allowed substances are detected on organic products.

Member States have different procedures and an agreement has not been found. Therefore, Member States can continue applying their national approaches until the topic will be discussed again in 2022/2023.

[ECOGLOBE LLC] [Caucascert LLC] will apply their sanctions and procedures based on Reg 2018/848 and 2021/1698.

Imports

In the new regulation, there will be two systems to import organic products from outside the EU:

• **Trade agreements of EU**: all Third Countries that are currently recognised as equivalent will have to renegotiate the terms for trade agreements under the new EU procedure. Under the current system, thirteen Third Countries are recognised:

- ⇒ Argentina,
- ⇒ Australia,
- ⇒ Canada,
- ⇒ Chile,
- ⇒ Costa Rica,
- ⇒ India,
- ⇒ Israel,
- ⇒ Japan,
- ⇒ the Republic of Korea,
- ⇒ Switzerland,
- ⇒ Tunisia,
- ⇒ the United States of America and
- ⇒ New Zealand.

• **Certifiers**: where there is not a trade agreement, the Commission will establish a list of recognised control bodies / authorities that will be authorised to perform controls and certification in Third Countries.

The EU regulation will be implemented identically within the EU and outside the EU.

Some flexibility will be allowed for the use of plant protection products and / or fertilisers traditionally used in Third Countries.

List of organic regulations

New Organic Regulation (EU) 2018/848 (it will apply from 1 January 2022)

Regulation (EU) 2018/848 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007

- Date of application postponed by **Regulation (EU) 2020/1693**
- Correction on the list of ingredients by **Corrigendum**
- Correction on wording by **Corrigendum**

Amended/Supplemented by:

Delegated Regulation (EU) 2020/427

- amended by **Delegated Regulation (EU) 2021/269**

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Implementing Regulation (EU) 2020/464
 – amended by Implementing Regulation (EU) 2020/2042
 – amended by Implementing Regulation (EU) 2021/1849
Delegated Regulation (EU) 2020/1794
 – corrected by Corrigendum
Delegated Regulation (EU) 2020/2146
Implementing Regulation (EU) 2021/279
Delegated Regulation (EU) 2021/642
Delegated Regulation (EU) 2021/715
Delegated Regulation (EU) 2021/716
Delegated Regulation (EU) 2021/771
Delegated Regulation (EU) 2021/1006
Implementing Regulation (EU) 2021/1165
Delegated Regulation (EU) 2021/1189
Delegated Regulation (EU) 2021/1342
Implementing Regulation (EU) 2021/1378
Delegated Regulation (EU) 2021/1691
Delegated Regulation (EU) 2021/1697
Delegated Regulation (EU) 2021/1698.

General Introduction of all rules described in 2018/848 can be found in the separate document.

Based on all regulations certification body has developed and applied number of procedures and documents, which are provided to all applicants and operators.

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